2	THOMAS M. BOEHM [SBN 63888] LAW OFFICE OF THOMAS M. BOEH 2 North Santa Cruz Avenue, Suite 211 Los Gatos, CA 95030-5900					
3	TELEPHONE: 408.998.8899 FACSIMILE: 408.998.4848 EMAIL: BOEHMTM@GM	<u>1AIL.CC</u>	<u>)M</u>			
567	ATTORNEY FOR PLAINTIFFS, BERNARD PICOT and PAUL DAVID MANOS x parte.defer rule 26.0ppo.pdm.wpd					
8	UNITED STATES DISTRICT COURT					
9	NORTHERN DISTRICT OF CALIFORNIA					
10	SAN JOSE DIVISION					
11	BERNARD PICOT and PAUL DAVID MANOS,)	CASE NO.	5:12-CV-01939 EJD		
13	Plaintiffs,)				
14 15 16	v. DEAN D. WESTON, and DOES 1 through 15, inclusive,)	DECLARATION OF PAUL DAVID MANOS IN OPPOSITION TO EX PARTE APPLICATION TO DEFER RULE 26 DISCLOSURES			
17 18	Defendants.)	Hearing date Hearing time Dept: Judge:	 None [Ex parte] None Courtroom 4, 5th Floor Hon. Edward J. Davila 		
19 20			Acton filed: Trial date:	March 23, 2012 None		
21 22	I, PAUL DAVID MANOS, decl	are as fo	ollows:			
23	I I am an adult natu	ıral pers	on and make t	his Declaration in oppositior		
24	to the Ex Parte Application filed by DEAN WESTON ["WESTON"] to					
25 26	delay the initial disclosures required under FRCivP, Rule 26.					
27	PICOT v WESTON, 5:12-CV-01939 EJD DECLARATION OF PAUL DAVID MANOS IN OPPOSITION TO					

EX PARTE APPLICATION TO DEFER RULE 26 DISCLOSURES...... Page 1 of 2 pages.

1	2	Attached hereto as EXHIBIT "A" is a true copy of an email I received			
2		on or about September 16, 2010 from WESTON.			
3					
4	3	WESTON'S mention of "DLB" in EXHIBIT "A" refers to a prior matter,			
5		unrelated to the hydrogen cells and electrolyte which are involved in			
6		this litigation.			
7					
8					
9	I declare under penalty of perjury under the laws of the United States that the				
10	foregoing is true of	f my personal knowledge, that if called as a witness I could and would			
11	testify competently	thereto, and that this declaration was executed at Stateline, Nevada on			
12	June 24, 2012.				
13					
14		(halforend towns.			
15		PAUL DAVID MANOS			
16		Tride Britis Magnico			
17					
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26					
27	DECLADATION OF DA	PICOT v WESTON, 5:12-CV-01939 EJD AUL DAVID MANOS IN OPPOSITION TO			
28		ION TO DEFER RULE 26 DISCLOSURES			

PICOT v WESTON, 5:12-CV-01939 EJD

EXHIBIT "A"

to
DECLARATION OF PAUL DAVID MANOS
IN OPPOSITION TO EX PARTE APPLICATION
TO DEFER RULE 26 DISCLOSURES



David Manos< dmanos55@gmail.com>

clean up

1 message

Dean Weston< deandavidweston@yahoo.com>
To: Dave Manos <dmanos55@gmail.com>

Thu, Sep 16, 2010 at 4:19 AM

Dave, I went through as you requested and put together the following. This takes care of everything to date as far as DBHS and the old DLB issues. We are getting a lot of heat and I am working on holding people off but its getting tough.

GMAC Hummer over milage and time - \$6,000.00 Payable to GMAC or collection agency

Nissan insurance and rent since April - \$6,000.00 Payable to FSG

Tracy Gutek credit card for DLB - \$25,000.00 Payable to US Bank

Dean Weston credit card for DLB - \$32,000.00 Payable to US Bank

DLB judgement against EI - \$20,000.00 Should be run through EI as judgement is against EI payable to Foundation Technologies

Dave, this cleans up our past, does nothing for me going forward but I know you are working hard on that.

Dean